



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

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E.P.A. — D.L.P.C.  
STATE OF ILLINOIS

DATE: July 9, 1984  
TO: Phil Van Ness  
FROM: Perry Mann *PM*  
SUBJECT: LPC 11911501 - Madison County - Wood River/Amoco Main Plant - ILD980700967  
Technical Referral for Enforcement

The purpose of this is to request a referral of the subject facility for Enforcement Action concerning Subpart F violations.

The outstanding violations documented in the inspections conducted on September 22, 1983 and June 26, 1984, are as follows:

Class I: 725.190  
725.191

Class III: 725.192d  
725.193f  
725.194

The Amoco-Main Plant facility was formerly the site on which Amoco Oil Company refined petroleum products, up until June 1, 1981. After this date, Amoco Chemical Company which shared a portion of the refinery (Main Plant) property assumed "control" over the entire acreage depicted at this site.

A 40 acre impoundment area depicted in the Part A as the "spray pond" area was identified by Amoco as being subject to Subpart F requirements. This impoundment area, where phosphorus sulfide is stored, is the component discussed in the Subpart F inspection dated September 22, 1983. (The report for the 6/26/84 inspection has not yet been completed; however, the violations remained the same.) Other smaller impoundments observed during the initial inspection appear to necessitate regulation under Subpart F. These components however were not named or identified in the facility's Part A.

The Subpart F Ground Water Monitoring Program as implemented is extremely inadequate. The four monitoring wells installed are not located or screened properly to determine what impact the facility is having or has had on the ground water. Boring information along with discussions with D. Sumner of Amoco Chemical indicates that a plume of hydrocarbons exists beneath the plant facility as the result of product spills, leaks, etc. Samples collected by M. Dilday on 6/26/84 from two of the Subpart F wells exhibited hydrocarbon odors.

The aforementioned apparent violations were cited in the Compliance Inquiry Letter dated May 24, 1984. Amoco responded in a letter dated June 1, 1984 and indicated that the Class I violations are due to "differences in judgement and interpretation of existing hydrogeologic conditions". Amoco also cited that the Class III violations have been corrected as per correspondence attached. This is incorrect in that the data supplied refers specifically to the River Front property, ILD980503106, which is near the subject facility, but separately regulated.

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The Subpart F issues are difficult to isolate from other outstanding Interim Status violations. Since June 1981, Amoco Oil's petroleum processing operations have been stopped. Hazardous wastes regulated under Subtitle G regulations were generated by the refinery processes, of which, some of these wastes are currently being stored on the Main Plant property. Amoco Chemical, while under the parent Amoco "umbrella" is a separate entity which seemingly has taken over the responsibilities under Interim Status from Amoco Oil for the subject facility. No Amoco Oil representative or office exists at the Wood River-Main Plant site.

It would seem that prior to June 1981, Amoco Oil should have notified the Regional Administrator that the facility was going into closure, and removed wastes stored in the subject impoundment area. Instead, the wastes are still being stored and "managed" by Amoco Chemical, although no revisions to change the owner/operator on the Part A have been made, nor has data concerning the transfer of responsibility been made clear or formalized. The question of "abandonment" of this facility by Amoco Oil becomes both necessary and difficult to answer.

It is because the outstanding Subpart F violations were not resolved as per Amoco's June 1, 1984 reply to the CIL, and no compliance schedule proposed since that letter, that this request for the referral of violations for Enforcement Action is made. Amoco's letter requested that a meeting concerning the apparent outstanding violations be held in July. As per a phone conference with M. Haney on 7/6/84, he will be contacting Ed Sullivan of Amoco Oil concerning this request. The recent guidance given towards expediting enforcement activities vis-a-vis the nature of Amoco's CIL response makes the next course of action uncertain. It is requested that upon EDG's review that a decision be made as to the strategy of action to be taken, i.e. federal and/or state action, PECL, ENL, etc.

Just recently, it has come to the Southern Region's attention that USEPA representatives conducted an investigation at the subject facility. It seems as though Region V is paying particular attention to both of Amoco's facilities that Subpart F is applicable. The motives for these inspections and their findings remain unknown at this time.

PCM:jlr

cc: Bob Kuykendall  
Tom Cavanagh  
Gary King  
Mark Haney ✓  
Southern Region

·Attachments